
**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KEISHA BROWN, AS ADMINISTRATOR OF
THE ESTATE OF AARON JENKINS

Plaintiff

v.

CITY OF PHILADELPHIA, PHILADELPHIA
AIRPORT, WORLDWIDE FLIGHT SERVICES,
INC., and FRONTIER AIRLINES

Defendants

CIVIL ACTION

NO. 2:20-cv-05532-CMR

PLAINTIFF’S INITIAL DISCLOSURES PURSUANT TO RULE 26(a)

Plaintiff, Keisha Brown, Administrator of the Estate of Aaron Jenkins, by and through her undersigned counsel, provides the following disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure:

Plaintiff reserves the right to amend these disclosures as discovery continues.

Fed. R. Civ. P. 26(a)(1)(A)(i)

“the name and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information”

<u>Name</u>	<u>Subject</u>
Tamara Pryor 1370 Anchor Street Philadelphia PA 19125	His knowledge of the circumstances leading to Plaintiff’s wrongful death as well as Plaintiff’s damages.
Felicia Greggs 533 S. Christian Street Lancaster, PA 17602	Her knowledge of the circumstances leading to Plaintiff’s wrongful death as well as Plaintiff’s damages.
Keisha Brown 1446 W. Spark St. Philadelphia, PA 19141	Her knowledge of the circumstances leading to Plaintiff’s wrongful death as well as Plaintiff’s damages.
Sierra Wynder 1370 Anchor Street Philadelphia PA 19125	Her knowledge of the circumstances leading to Plaintiff’s wrongful death as well as Plaintiff’s damages.

Aaliyah Snyder 1370 Anchor Street Philadelphia, PA 19125	Her knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages..
David Heller 5856 Chestnut St. Philadelphia, PA 19131	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Kevin Emmanuel 2130 N. Hobart Street Philadelphia PA 19131	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Devon Greaves	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Clarence Williamson	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Fabian Silvera	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Clifton Walker	His knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.
Detective Tolliver Detective Golphin Detective Grace Detective Alminde Detective Hernandez Detective McAndrews Detective Fetters Detective Wojciechowski Detective Frank Luca Sgt. Coan Police Officer Anthony Crawford Police Office Michael Iannacone Police Officer Eric Blacker 750 Race Street Philadelphia PA 19106	Their knowledge of the circumstances leading to Plaintiff's wrongful death as well as Plaintiff's damages.

Plaintiff reserves the right to call any of the individuals whose names appear in any of the documents produced in discovery. Plaintiff also reserves the right to call any witness identified by the Defendants.

Fed. R. Civ. P. 26(a)(1)(A)(ii)

Documents

“a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;”

1. Letters of Administration appointing Keisha Brown

Fed. R. Civ. P. 26(a)(1)(A)(iii)

“a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and”

1. Pain and Suffering of the Plaintiff’s Decedent and his statutory survivors.
2. Economic damages including loss of earnings, earning capacity, loss of household services and more. This opinion will be provided by an appropriate expert witness.
3. All applicable Wrongful Death Action Damages.
4. All applicable Survival Action Damages.

Fed. R. Civ. P. 26(a)(1)(A)(iv)

“for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.”

There are no insurance agreements in Plaintiff’s Decedent’s possession under which an insurance business may be liable to satisfy all or part of any possible judgment, or to indemnify or reimburse for payments made to satisfy the judgment.

Respectfully submitted,

STAMPONE O’BRIEN DILSHEIMER

BY: /s/Prince Holloway

Prince P. Holloway., Esq.
Attorney for Plaintiffs
Attorney I.D. No. 209591
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Cheltenham, PA 19012
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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused a true and correct copy of Plaintiff's Initial Disclosures Pursuant to Rule 26(a) to be served upon all counsel via email and/or through the U.S.D.C. Electronic Filing.

/s/*Prince Holloway*
PRINCE HOLLOWAY, ESQUIRE

Dated: 9/21/2021

LETTERS OF ADMINISTRATION

REGISTER'S OFFICE
PHILADELPHIA COUNTY, PA

Nº A3975-2018



ESTATE OF Aaron Jenkins
AKA: Aaron James Jenkins

Social Security No. 206-70-6187

WHEREAS, Aaron Jenkins
late of 126 W. Roselyn, Philadelphia, PA 19120
died on the 3rd day of May, 2018;
and

WHEREAS, the grant of letters of administration is required for the administration of his estate.

THEREFORE, I, RONALD R. DONATUCCI, Register for the Probate of Wills and Grant of Letters Testamentary and of Administration, in and for the County of Philadelphia in the Commonwealth of Pennsylvania, hereby certify that I have granted Letters of Administration

to KEISHA BROWN

who has duly qualified as Administrator of the estate of the above named decedent and has agreed to administer the estate according to law, all of which fully appear of record in the Office of the Register of Wills of Philadelphia County, Pennsylvania.

IN TESTIMONY WHEREOF, I have hereunto set my hand and affixed the seal of my office, at Philadelphia, the 28th day of September, 2018

Deputy Register

Office of the Register of Wills of Philadelphia County, Pennsylvania

File #: A3975-2018

Commonwealth of Pennsylvania

County of Philadelphia



ss.

I, **RONALD R. DONATUCCI, ESQUIRE**, Register for the Probate of Wills and Granting Letters of Administration in and for the County of Philadelphia, in the Commonwealth of Pennsylvania

DO HEREBY CERTIFY AND MAKE KNOWN That on the 28th day of September

in the year of our Lord 2018 **LETTERS OF ADMINISTRATION**

on the Estate of Aaron Jenkins

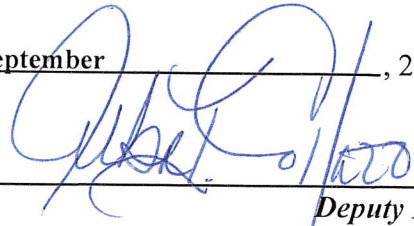
(AKA: Aaron James Jenkins)

Deceased, were granted unto KEISHA BROWN

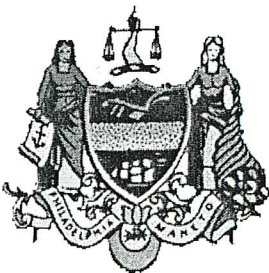
having first been qualified well and truly to administer the same. And I further certify that no revocation of said Letters appears of record.

Date of death 5/3/2018

Given under my hand and seal of office, this 28th day of September, 2018



Deputy Register



NOT VALID WITHOUT ORIGINAL SIGNATURE AND IMPRESSED SEAL